

EXHIBIT F

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

PACIFIC GAS AND ELECTRIC COMPANY.

Defendant.

Case No. 14-CR-00175-WHA

RESPONSE TO NOTICE RE CALIFORNIA WILDFIRES

Judge: Hon. William Alsup
Date: December 31, 2018

Defendant Pacific Gas & Electric Company (“PG&E”) submits this response to the Court’s Notice re California Wildfires dated November 27, 2018:

1. What requirements of the judgment herein, including the requirement against further federal, state, or local crimes, might be implicated were any wildfire started by reckless operation or

1 maintenance of PG&E power lines?

2

3 Response:

4 If it were determined that a wildfire had been started by reckless operation or maintenance of
5 PG&E power lines, that would, if the specific circumstances gave rise to a violation of federal,
6 state, or local statutes, implicate the requirements of Special Condition of Probation #1 of the
7 judgment, which provides that while on probation, PG&E shall not commit another Federal,
8 State, or local crime.

9

10 2. What requirements of the judgment herein might be implicated by any inaccurate, slow, or
11 failed reporting of information about any wildfire by PG&E?

12

13 Response:

14 a. If it were determined that PG&E had failed to meet reporting requirements related to wildfires,
15 the particular reporting failure would have to be reviewed for violation of federal, state, or local
16 statutes. If any such criminal statutes were violated, that would implicate the requirements of
17 Special Condition of Probation #1 of the judgment, which provides that while on probation,
18 PG&E shall not commit another Federal, State, or local crime.

19 b. If it were determined that PG&E had failed to meet its reporting requirements to U.S. Probation
20 in connection with wildfires, depending on the particular reporting failure, that would implicate
21 the following requirements of the judgment:

- 22 i. Condition of Probation #2, which requires PG&E to answer truthfully all inquiries by
23 the probation officer and follow the instructions of the probation officer;
24 ii. Condition of Probation #5, which requires PG&E to notify the probation officer within
25 seventy-two hours of any criminal prosecution, major civil litigation, or administrative
26 proceeding against PG&E;

- iii. Special Condition of Probation #8, which requires PG&E to notify the probation officer immediately upon learning of the commencement of any major civil action, criminal prosecution, or administrative proceeding against PG&E, or any investigation or formal inquiry by governmental authorities regarding the organization.

3. What specific steps has the monitor herein taken to monitor and improve PG&E safety and reporting with respect to power lines and wildfires?

Response:

Following the January 2017 Judgement and Order in this matter, the Court appointed the Honorable Mark Filip (Ret.) to serve as independent federal monitor over certain aspects of PG&E's business. To meet the goals and the requirements of the Court's Order, in April of 2017 the Monitor and his team began reviewing and monitoring various areas, including: (1) PG&E's safety culture, (2) PG&E's enterprise Compliance and Ethics program, and (3) the specific requirements enumerated in paragraphs I.B.(1)-(15) of the Order. While much of this work focuses on PG&E's natural gas operations, certain aspects include an enterprise-wide evaluation, including aspects of safety, such as safety culture, risk management, and compliance and ethics. To conduct this scope of work, the Monitor assembled a team of dozens of lawyers and subject matter experts in varied areas such as integrity management, gas transmission, utility operations, risk evaluation, compliance and ethics, and safety.

In November 2017, as a result of the October 2017 North Bay wildfires, the Monitor, the United States Attorneys' Office and PG&E agreed that the Monitor team would also evaluate certain aspects of PG&E's electric distribution operations, including reviewing the adequacy of PG&E's: (1) vegetation management plan, (2) electric pole and equipment maintenance and inspection programs, and (3) emergency response and restoration practices. Given the multiple independent lawsuits related to the North Bay wildfires, as well as the ongoing regulatory

1 review by various state and local agencies, the parties further agreed that that the Monitor team
 2 would not evaluate or opine on the cause of any of the North Bay fires. Consistent with this
 3 supplemental scope, the Monitor onboarded new members to his team, including additional
 4 attorneys and industry veterans with expertise in the relevant areas of electric operations.

5
 6 The Monitor team has undertaken numerous activities focused on PG&E's electric operations,
 7 including:

- 8 • Meeting with dozens of electric employees, ranging from the most senior leaders to
 9 field employees;
- 10 • Conducting multiple field visits, including to inspection projects related to electric
 11 distribution poles and equipment, base camp established for response and restoration in
 12 wildfire affected areas, and PG&E's Emergency Operations Center and Wildfire Safety
 13 Operations Center;
- 14 • Participating in operational meetings and telephone calls, such as status calls on
 15 operational performance and risks related to electric distribution and PG&E's Public
 16 Safety Power Shutoff program;
- 17 • Receiving real-time emergency response and operational updates during and following
 18 the 2017 and 2018 wildfires; and
- 19 • Receiving hundreds of files in response to data requests related to various aspects of
 20 electric operations, including: distribution maintenance programs, wildfire safety
 21 operations, pole and wire inspection and maintenance, vegetation
 22 clearance/management and emergency response.

23
 24 More broadly, from the start of the monitorship, the Monitor team has been and remains
 25 engaged with PG&E on a wide range of areas, many of which relate to the company's overall
 26 safety and culture. For example, over approximately the last 20 months, the Monitor team has:

- 27 • Attended hundreds of meetings at all levels of the company, ranging from Board of

1 Directors and senior officer meetings to all-employee town halls, operational meetings
 2 and field visits;

- 3 • Periodically attended Board and Board Committee Meetings, including executive
 4 sessions with the Board;
- 5 • Traveled throughout PG&E's service territory to attend field projects such as
 6 equipment testing and inspection work, and conduct interviews and meetings with over
 7 200 employees;
- 8 • Visited operational facilities including stations, natural gas storage fields, training
 9 facilities, crew yards, and service centers;
- 10 • Conducted panel discussions with dozens of employees, focused primarily on
 11 compliance and ethics and safety culture;
- 12 • Received thousands of files from PG&E (over 35 gigabytes of data) in response to
 13 requests for information;
- 14 • Maintained regular communications with PG&E, including participating in standing
 15 weekly calls to discuss emerging issues and general updates; and
- 16 • Established a Monitor Helpline for PG&E employees to raise concerns directly to the
 17 Monitor team, which PG&E has publicized among its workforce.

- 18
- 19 4. Provide an accurate and complete statement of the role, if any, of PG&E in causing and
 20 reporting the recent Camp Fire in Butte County and all other wildfires in California since the
 21 judgment herein.

22

23 Response:

24 PG&E's response to Question 4 is structured in three parts, as follows:

25 In part one, in response to the Court's request for information concerning PG&E's role in
 26 "reporting" wildfires, we provide an overview of the various ways in which PG&E has submitted
 27 information to its regulator, the California Public Utilities Commission ("CPUC"), as well as to the
 28

1 California Department of Forestry and Fire Protection (“CAL FIRE”), since the Final Judgment.¹
 2 This includes both routine required regulatory reports and responses to investigatory data,
 3 document and information requests. As discussed below, because of the volume of these materials,
 4 PG&E has not submitted to the Court all of the reports that PG&E has made to CAL FIRE and the
 5 CPUC related to wildfires in its service territory during 2017 and 2018, but will provide them at
 6 the Court’s request.² We do, however, provide examples of these reports for the Court’s review.
 7

8 In part two, we provide a summary of the facts concerning the November 2018 Camp Fire that
 9 began in Butte County. CAL FIRE has not released its conclusions about the cause of the Camp
 10 Fire, although it has publicly identified two potential incident locations at which PG&E facilities
 11 are located. PG&E is actively cooperating with investigations into the Camp Fire by both CAL
 12 FIRE and the CPUC. To assist the Court in understanding the facts relevant to the potential cause
 13 of the Camp Fire, PG&E has included a factual report that is attached as Exhibit A. A glossary of
 14 terms referenced in that report is attached as Exhibit B and a guide to reviewing the information
 15 provided in the report is attached as Exhibit C.³

16
 17 In part three, we discuss the wildfires that impacted the North Bay and other parts of Northern
 18 California during October 2017. While CAL FIRE has reported that more than 172 wildfires started
 19 on October 8 and the following days as strong winds moved through Northern California, the focus
 20 of the CPUC, CAL FIRE and civil plaintiffs has been on a subset (21) of those fires (referred to
 21

22 ¹ CAL FIRE is generally the lead investigator of all wildfires in the state. In certain instances, depending upon the
 23 location of a particular fire, local fire departments may also conduct investigations. Wildfires that occur on Federal
 24 property may be investigated by the United States Forest Service. The Safety and Enforcement Division (“SED”)
 25 of the California Public Utilities Commission (“CPUC”) also conducts investigations in connection with wildfires
 26 that may have been caused by PG&E’s equipment.

27 ² PG&E has interpreted Question 4 of the Court’s order to refer only to wildfires that have occurred within PG&E’s
 28 service territory, as fires that originated outside of PG&E’s service territory could not have been caused by PG&E
 equipment.

³ The guide attached as Exhibit C was previously provided to the CPUC in connection with the submission of fact
 27 reports to the CPUC by PG&E concerning the October 2017 North Bay Wildfires. Those reports are discussed
 28 further below.

1 here as the “North Bay Wildfires”).
 2

3 PG&E’s investigation into the causes of the North Bay Wildfires is ongoing. Those wildfires are
 4 the subject of coordinated civil litigation pending before the Honorable Curtis E.A. Karnow in the
 5 Superior Court of California-County of San Francisco. That coordinated litigation involves more
 6 than 3,000 individual plaintiffs, dozens of insurance companies and various local and county-level
 7 government entities. Discovery is ongoing and there have not been any rulings with respect to
 8 cause and origin for any of the North Bay Wildfires. PG&E is still in the process of obtaining
 9 documents, data, photographs and eyewitness accounts of issues relevant to the cause and origin of
 10 each of the North Bay Wildfires.

11
 12 PG&E is also awaiting the opportunity to review most of the reports that CAL FIRE has prepared
 13 concerning the North Bay Wildfires. In addition, PG&E has not been able to examine in detail any
 14 of the potentially relevant evidence that CAL FIRE collected from the various potential origin
 15 points. Generally speaking, when a large wildfire occurs, CAL FIRE will cordon off areas of
 16 interest and limit access to those locations until after it has completed its initial investigation and
 17 collected the evidence that it believes is relevant to the potential cause and origin of a particular
 18 fire. CAL FIRE will then take that evidence into its possession and restrict access to it. This is
 19 the approach that CAL FIRE took with respect to both the Camp Fire and the North Bay Wildfires
 20 and PG&E therefore has not yet had access to the evidence that appears CAL FIRE has identified
 21 as relevant.⁴ Thus, while CAL FIRE has released at least its high-level conclusions with respect to
 22 18 of the North Bay Wildfires and has, in each instance, determined that the relevant fire was
 23 attributable to PG&E’s facilities, PG&E has not been able to review the detail behind most of those
 24 findings or the evidence related to any of them.

25
 26
 27 ⁴ PG&E, along with the civil plaintiffs in litigation concerning the North Bay Wildfires, have been working with
 28 CAL FIRE, the relevant district attorneys and the office of the Attorney General to arrange for access to the CAL
 FIRE evidence and reports.

1 In an effort to provide the Court with current, detailed information concerning the potential cause
 2 of each of the North Bay Wildfires, PG&E has included with this submission factual reports
 3 concerning the North Bay Wildfires that it previously provided to the CPUC in response to
 4 regulatory data requests. For each of those fires, PG&E also created supplemental reports for the
 5 Court that include additional information that is available to PG&E, including information that has
 6 become available through further investigation and the discovery process. PG&E did not submit
 7 factual reports to the CPUC for the Blue Fire, Pressley Fire, or the Highway 37 Fire (“37 Fire”),
 8 three of the North Bay Wildfires that did not meet the CPUC’s reporting criteria. PG&E has
 9 therefore prepared a factual report for those fires for the Court in response to Question 4.⁵

10
 11 The second and third parts described above, and the corresponding factual reports, provide detailed
 12 information concerning the Camp Fire and the 21 North Bay Wildfires that are alleged to have been
 13 attributable to PG&E’s facilities since the Final Judgment. In responding to the Court’s question,
 14 however, it is important to note that CAL FIRE has reported approximately 530 wildfires in
 15 PG&E’s service territory during 2017 and 2018. Most of those wildfires are not alleged to relate
 16 to PG&E equipment. For example, one of the largest fires in 2018 in PG&E’s service territory was
 17 the Carr fire, which CAL FIRE has indicated was caused by mechanical failure of a vehicle. Of
 18 the approximately 315 wildfires reported by CAL FIRE in 2017 in PG&E’s service territory,
 19 approximately 40 of those fires (including the 21 North Bay Wildfires) have been alleged to be
 20 attributable to PG&E facilities.

21
 22 With respect to wildfires that may involve PG&E equipment other than the Camp Fire and the
 23 North Bay Wildfires, PG&E has included a report that it submitted to the CPUC for the calendar
 24 year 2017. This report, which can be found at Exhibit D, includes information concerning wildfires

25
 26 ⁵ The reports provided with this submission reference a significant amount of data, documents and testimony
 27 collected by PG&E. In light of the volume of these materials, PG&E has not included all of the cited materials with
 this submission but will provide that information to the Court upon request.

1 as well as non-wildfire fire events (such as structure fires) in PG&E's service territory, including
 2 information about the potential cause of each fire. A similar report for fires that occurred in 2018
 3 will be filed with the CPUC in April 2019, which is when it is due. PG&E has, however, filed 17
 4 electric incident reports ("EIR") with the CPUC in 2018 for incidents that may have been related
 5 to wildfires, including the two EIRs submitted concerning incidents that may be related to the Camp
 6 Fire. The EIR reports that may be related to the Camp Fire, described in additional detail below,
 7 are attached as Exhibits E & F.

8

9 **I. PG&E Wildfire Reporting Mechanisms**

10 PG&E routinely submits EIRs to the CPUC when the Commission's reporting criteria are met. The
 11 CPUC requires electric utilities such as PG&E to report to the CPUC incidents that are attributable
 12 or allegedly attributable to utility-owned facilities and (1) result in a fatality or personal injury
 13 rising to the level of in-patient hospitalization; (2) are the subject of significant public attention or
 14 media coverage; or (3) involve damage to property of the utility or others estimated to exceed
 15 \$50,000. (CPUC Decision 06-04-055 Appendix B.) Within 20 business days of a reportable
 16 incident, the utility must provide the CPUC with a written account of the incident, including a
 17 description of the nature of the incident, its cause and estimated damage, as well as a description
 18 of the utility's response to the incident and the measures it took to repair facilities and/or remedy
 19 any related problems on the system which may have contributed to the incident (the "20 day
 20 report"). An example of each type of report can be found at Exhibits G & H.

21

22 PG&E has submitted a total of 131 EIRs from January 1, 2017 to December 20, 2018. Of those
 23 131 EIRs, 86 EIRs could relate to fire incidents. Not all of those fire-related EIRs, however, are
 24 potentially related to wildfires. Of the 86 EIRs, 43 EIRs potentially relate to wildfires: 26 EIRs in
 25 2017 and 17 EIRs in 2018.⁶

26

27 ⁶ An example of a potentially fire-related EIR that does not relate to a wildfire is attached as Exhibit I. That EIR
 28 concerns a structure fire (i.e., house fire) that may have been related to an electrical incident.

In addition, on February 5, 2014, the CPUC adopted a Fire Incident Data Collection Plan, which requires all electric utilities to submit an annual report to the CPUC of all fire-related reportable events that could include PG&E facilities meeting the following conditions: “(a) A self-propagating fire of material other than electrical and/or communication facilities, [where] (b) The resulting fire traveled greater than one linear meter from the ignition point, and (c) The utility has knowledge that the fire occurred”. (CPUC Decision 14-02-015.) Fires whose ignition is not associated with utility facilities are excluded from this reporting requirement, (*id.* Appendix C-3 n.4), as the CPUC’s objective is the collect data “for all fires started by overhead power-line facilities”. (*Id.* at 79.) Pursuant to the Fire Incident Data Collection Plan, PG&E reported to the CPUC 362 reportable fire-related incidents between January 1, 2017 and December 31, 2017. Many of the fires contained in the report are not wildfires. Many of those incidents also involve third-parties (such as, for example, a helicopter or a car contacting PG&E’s facilities). A copy of that report is attached as Exhibit D. As noted, the 2018 report will be submitted in April 2019.

In addition to the EIRs and the materials submitted pursuant to the Fire Incident Data Collection Plan, PG&E routinely provides data, documents and information to the CPUC, CAL FIRE and other entities investigating PG&E’s potential role in wildfires. By way of example, in connection with the October 2017 North Bay Wildfires (discussed in further detail below), PG&E has responded to more than 400 specific requests for information and documents from the CPUC. In connection with those responses, PG&E has produced to the CPUC more than 6,500 documents totaling more than 23,000 pages. PG&E is continuing to respond to requests from the CPUC regarding the October 2017 North Bay Wildfires.

PG&E has also been actively responding to data and information requests from CAL FIRE in connection with the October 2017 North Bay Wildfires. As of the date of this submission, PG&E has responded to at least 8 CAL FIRE data requests for the 2017 North Bay Wildfires, many of

1 which contain multiple questions, and produced more than 5,000 files constituting more than
 2 140,000 pages.

3
 4 PG&E is similarly responding to requests from both CAL FIRE and the CPUC with respect to the
 5 more recent Camp Fire.

6
 7 In certain instances, PG&E will also report the existence of a wildfire to emergency personnel if
 8 PG&E is a witness to the initial origin or spread of a wildfire. For example, as discussed in further
 9 detail below, a PG&E employee called the PG&E switchboard in the first hour of the Camp Fire
 10 (based on CAL FIRE's estimated time of origin) to report the fire, and the switchboard called
 11 emergency services.

12
 13 II. November 2018 Camp Fire

14 According to information provided by CAL FIRE, the Camp Fire began at 6:33 a.m. on the morning
 15 of November 8, 2018. By the time it was fully contained, the Camp Fire burned a reported 153,336
 16 acres and destroyed a reported total of 18,793 structures. CAL FIRE has reported 86 fatalities from
 17 the Camp Fire.

18
 19 CAL FIRE has publicly identified two potential origin points for the Camp Fire. One location is
 20 approximately one mile northwest of the unincorporated town of Pulga near a series of PG&E
 21 transmission lines and, in particular, near Tower :27/222 on PG&E's Caribou-Palermo 115 kV
 22 Transmission Line (the "Camp 1 incident location"). The other location is off Pulga Road at Camp
 23 Creek Road near Jarbo Gap, in the vicinity of a PG&E distribution line (the "Camp 2 incident
 24 location").

25
 26 On November 8, 2018, PG&E filed with the CPUC an EIR (Incident No. 181108-9002) concerning
 27 an outage on the Caribou-Palermo 115 kV Transmission Line in Butte County at approximately

1 6:15 a.m. on November 8, 2018. This EIR concerns the Camp 1 incident location and is attached
2 as Exhibit E.

3
4 On November 16, 2018, PG&E filed with the CPUC an EIR (Incident No. 181116-9015)
5 concerning an outage on the Big Bend 1101 12 kV Circuit in Butte County at approximately 6:45
6 a.m. on November 8, 2018. This EIR concerns the Camp 2 incident location and is attached as
7 Exhibit F.

8
9 On December 11, 2018, PG&E filed with the CPUC a 20-Day Supplemental Report providing
10 additional information related to the events described in those EIRs. That report is attached as
11 Exhibit J. As described in the 20-Day Supplemental Report, PG&E observed damage to PG&E
12 equipment at both incident locations during patrols that took place after the onset of the Camp Fire
13 and when it assisted CAL FIRE in collecting evidence at the incident locations.

14
15 PG&E additionally submitted a report to the Department of Energy. This report is attached as
16 Exhibit K.

17
18 PG&E employees working at nearby facilities were also among the first to observe the Camp Fire.
19 One of those employees called the fire into a PG&E switchboard, which then contacted emergency
20 services. This call included an observation of fire, which was in the vicinity of Tower :27/222.

21
22 Exhibit A is a factual report that PG&E has prepared for this submission concerning the potential
23 cause and origin of the Camp Fire.

24
25 **III. October 2017 North Bay Wildfires**

26 Beginning on October 8, 2017, multiple wildfires spread through Northern California, including
27 Napa, Sonoma, Butte, Humboldt, Mendocino, Lake, Nevada and Yuba Counties, as well as in the

1 area surrounding Yuba City. According to the CAL FIRE California Statewide Fire Summary of
 2 something that dated October 30, 2017, at the peak of the wildfires, there were 21 major wildfires
 3 in Northern California that, in total, burned over 245,000 acres and destroyed an estimated 8,900
 4 structures. The wildfires resulted in a reported 44 fatalities.

5
 6 As noted above, PG&E previously provided detailed factual reports concerning a number of these
 7 fires to the CPUC at its request. PG&E is submitting those detailed reports in response to the
 8 Court's request for information concerning PG&E's role in causing any wildfires since the Final
 9 Judgment.

10
 11 Since receiving the Court's November 27, 2018, Order, PG&E has undertaken an effort to collect
 12 additional potentially relevant information concerning the North Bay Wildfires for which it
 13 previously submitted factual reports to the CPUC. PG&E has also drafted a factual report for the
 14 Court related to the Blue Fire, the Pressley Fire and the 37 Fire since they were not reported to the
 15 CPUC per the required reporting criteria. In preparing these additional reports, PG&E gathered
 16 information from among the following sources: (1) formal third-party witness discovery in the
 17 North Bay Wildfires Litigation (including, for example, third-party depositions); (2) information
 18 identified within PG&E as part of its ongoing investigations or response to litigation discovery
 19 requests; and (3) publicly available information that PG&E has gathered since submitting its initial
 20 fact reports.

21
 22 The factual reports concerning the 2017 North Bay Wildfires are organized as follows:

| Fire Name ⁷ | Original CPUC Report | Report Prepared in Response to Question 4 |
|------------------------|----------------------|---|
| Abode | Exhibit L | Exhibit EE |

23
 24
 25
 26⁷ This table identifies reports for 23 fires, rather than 21, because: (1) the CPUC requested separate reports for the
 27 Potter Valley and Redwood incidents, both of which CAL FIRE has treated together as part of the Redwood/Potter
 28 Valley Fire; and (2) we are providing the Court with a report for the Sullivan fire, which the CPUC did not previously
 request, and which is not one of CAL FIRE's 21 major wildfires, but is part of pending litigation.

| Fire Name ⁷ | Original CPUC Report | Report Prepared in Response to Question 4 |
|------------------------|----------------------|---|
| Atlas | Exhibit M | Exhibit FF |
| Blue | N/A ⁸ | Exhibit GG |
| Cascade | Exhibit N | Exhibit HH |
| Cherokee | Exhibit O | Exhibit II |
| Honey | Exhibit P | Exhibit JJ |
| LaPorte | Exhibit Q | Exhibit KK |
| Lobo | Exhibit R | Exhibit LL |
| Maacama | Exhibit S | Exhibit MM |
| McCourtney | Exhibit T | Exhibit NN |
| Norrbom | Exhibit U | Exhibit OO |
| Nuns | Exhibit V | Exhibit PP |
| Oakmont | Exhibit W | Exhibit QQ |
| Partrick | Exhibit X | Exhibit RR |
| Pocket | Exhibit Y | Exhibit SS |
| Point | Exhibit Z | Exhibit TT |
| Potter Valley | Exhibit AA | Exhibit UU |
| Pressley | N/A | Exhibit VV |
| Redwood | Exhibit BB | Exhibit WW |
| Sullivan | N/A | Exhibit XX |
| Sulphur | Exhibit CC | Exhibit YY |
| Tubbs | Exhibit DD | Exhibit ZZ |
| 37 | N/A | Exhibit AAA |

⁸ N/A applies to situations where the CPUC did not request a factual report (i.e., the Blue, Pressley, Sullivan and 37 Fires).

1 As noted, the North Bay Wildfires are subject to litigation in a coordinated proceeding before Judge
 2 Curtis E.A. Karnow in the Superior Court for the State of California, San Francisco. As part of that
 3 litigation, PG&E has produced voluminous data and documents and has had dozens of its
 4 employees deposed. PG&E and plaintiffs have also deposed a number of third-party witnesses to
 5 certain of the October 2017 North Bay Wildfires. Discovery is ongoing and the parties have not
 6 yet begun expert disclosures. PG&E has not included its protected work product as part of this
 7 submission.

8
 9 As noted, the North Bay Wildfires are subject to litigation in a coordinated proceeding before Judge
 10 Curtis E.A. Karnow in the Superior Court for the State of California, San Francisco. As part of that
 11 litigation, PG&E has produced voluminous data and documents and has had dozens of its
 12 employees deposed. PG&E and plaintiffs have also deposed a number of third-party witnesses to
 13 some of the October 2017 North Bay Wildfires. Discovery is ongoing and the parties have not yet
 14 begun expert disclosures. PG&E has not included its protected work product as part of this
 15 submission.

16
 17 Finally, as additional relevant background to the Court's question, we note that CAL FIRE has
 18 issued its determination on the causes of 18 of the North Bay Wildfires.⁹ In each instance, CAL
 19 FIRE has alleged that the relevant fire was caused by PG&E's equipment. CAL FIRE has also
 20 alleged that 11 of the 18 North Bay Wildfires for which it has completed its investigations involved
 21 violations of state law. In those instances, CAL FIRE referred the relevant wildfire to the local
 22
 23

24 ⁹ CAL FIRE has not yet announced its determination of cause for the Tubbs fire, which is the largest of the North
 25 Bay Wildfires. The Tubbs fire, located in Napa and Sonoma counties, started the evening of October 8, 2017, and
 26 burned a reported total of 36,807 acres and destroyed a reported total of 5,636 structures. There were 21 reported
 27 civilian fatalities. Pursuant to the governing accounting requirements, PG&E has disclosed in its filings with the
 28 United States Securities & Exchange Commission that PG&E has determined that a loss for claims in connection
 with 14 of the North Bay Wildfires—La Porte, McCourtney, Lobo, Honey, Redwood, Sulphur, Cherokee, Blue,
 Pocket and Sonoma/Napa merged fires (which include the Nuns, Norrbom, Adobe, Partrick and Pythian fires)—is
 probable and estimable.

1 district attorney's office for review.¹⁰
 2

3 While CAL FIRE publicly released its investigative reports for the wildfires for which it did not
 4 allege violations of state law, it has yet to release the investigative reports for any of the fires that
 5 have been referred to county district attorneys' offices. In addition, PG&E has not been able to
 6 examine potentially relevant evidence that CAL FIRE collected from the potential areas of origin
 7 of each of the North Bay Wildfires. As a result, PG&E, its counsel and its expert investigators have
 8 not yet been able to view the potentially most significant evidence with respect to any of the October
 9 2017 North Bay Wildfires.

10 For the Court's convenience, PG&E has attached CAL FIRE press releases concerning the results
 11 of its investigations into 18 of the 21 North Bay Wildfires as Exhibits BBB through DDD.¹¹
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 23
 24 ¹⁰ CAL FIRE forwarded its investigation report related to the Cascade Fire to the local district attorney's office,
 25 although it acknowledged in its press release that it found no violations of the Public Resource Code. On the same
 26 day that CAL FIRE announced its investigative findings, the Yuba County District Attorney announced that he did
 27 not intend to file charges against PG&E concerning the Cascade Fire. CAL FIRE subsequently released its
 28 investigation report.

¹¹ PG&E understands that those North Bay Wildfires that have been referred to local district attorney's offices remain
 under review by those offices, except for the Honey, LaPorte and Cherokee fires which were resolved through civil
 settlements.

1
2 Dated: December 31, 2018
3
4

Respectfully Submitted,

JENNER & BLOCK LLP

5 By: /s/ Reid J. Schar
6 Randy Mehrberg (*pro hac vice*)
7 Reid J. Schar (*pro hac vice*)
8
9

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10 Attorneys for Defendant PACIFIC GAS AND
11 ELECTRIC COMPANY
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EXHIBIT A

CAMP FIRE INCIDENT DESCRIPTION & FACTUAL SUMMARY

Background:

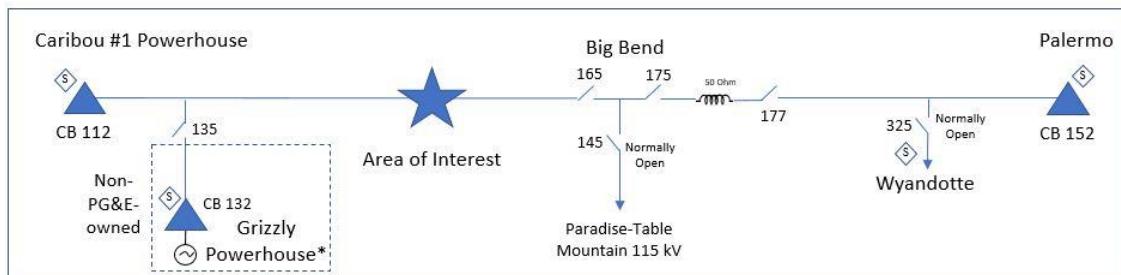
CAL FIRE's website identifies the start time of the Camp Fire as November 8, 2018 at 6:33 a.m. The website lists the location of the fire as Pulga Road at Camp Creek Road near Jarbo Gap. CAL FIRE provides coordinates for the fire that are one mile northeast of the unincorporated town of Pulga, which is near Tower :27/222 on PG&E's Caribou-Palermo 115 kV Transmission Line (the "Camp 1 incident location").

On November 8, 2018, PG&E filed with the California Public Utilities Commission ("CPUC") an Electric Safety Incident Report ("EIR") (Incident No. 181108-9002) concerning an outage on the Caribou-Palermo 115 kV Transmission Line in Butte County that occurred on the same day at approximately 6:15 a.m. On November 16, 2018, PG&E filed with the CPUC an EIR (Incident No. 181116-9015) concerning an outage on the Big Bend 1101 12 kV Circuit in Butte County at approximately 6:45 a.m. on November 8, 2018 ("Camp 2 incident location"). On December 11, 2018, PG&E filed with the CPUC a 20-Day Supplemental Report providing additional information related to the events described in the foregoing EIRs.

As described in the 20-Day Supplemental Report and as described below, PG&E observed damage to PG&E equipment at both incident locations during patrols that took place after the onset of the Camp Fire and when PG&E assisted CAL FIRE with evidence collection at the incident locations.

Incident Overview:

Camp 1 Incident Location



On November 8, 2018, at approximately 6:15 a.m., the PG&E Caribou-Palermo 115 kV Transmission Line relayed and de-energized. What is now referred to as the Caribou-Palermo 115 kV transmission line was placed into service in the 1920s by the Great Western Power Company, which PG&E acquired in 1930. One customer, the Grizzly Powerhouse, was impacted by the transmission outage. Auto-reclosing on the line had been disabled previously as part of PG&E's wildfire mitigation program. As a result, the line did not test after it de-energized.

On the morning of November 8, 2018, certain PG&E employees and contractors observed fire in the Feather River Canyon area near Pulga. At about 6:28 a.m., a PG&E Hydro Generation Supervisor, then traveling northeast on Highway 70, radioed the Rock Creek Switching Station to report an approximately 100' x 100' fire in a clearing beneath PG&E transmission lines about one mile north of Pulga, near Poe Dam, which is near Tower :27/222 on PG&E's Caribou-Palermo 115 kV Transmission Line. PG&E's Rock Creek Switching Station reported the fire to authorities.

A PG&E Electrical Machinist heard the Hydro Supervisor's radio transmission while driving north from Chico along Highway 70. The Electrical Machinist pulled into a station operated by the California Department of Transportation located along Highway 70 south of Poe Dam. From that vantage point, the Electrical Machinist took two photos of the fire, both timestamped 6:44 a.m., November 8, 2018. These photographs have been provided by PG&E to CAL FIRE.

At approximately 6:48 a.m. on November 8, 2018, two other PG&E employees, a Hydro Electrician and a Hydro Sub-foreman, then staging at the PG&E Cresta Powerhouse, were alerted by two PG&E contractors affiliated with Syblon Reid of a nearby fire. Those employees observed a fire from their vantage point, from which they took photos and videos of the fire. The Sub-foreman provided to PG&E eight photos and three videos of the fire bearing timestamps ranging from 6:48 a.m. to 7:53 a.m., November 8, 2018. The Hydro Electrician also took photos of the fire from Cresta Dam and provided to PG&E 13 photos bearing timestamps ranging from 7:05 a.m. to 7:53 a.m., November 8, 2018. These photographs and videos have been provided by PG&E to CAL FIRE.

At approximately 7:00 a.m. on November 8, 2018, a PG&E Operating Clerk was driving south along Highway 70 when the Operating Clerk observed smoke rising from Feather River Canyon. The Operating Clerk pulled over at mile marker 42.87 on Highway 70, where the Operating Clerk took two photos of the smoke, each bearing a timestamp of 7:01 a.m., November 8, 2018. The Operating Clerk then continued down Highway 70 to a retaining wall near mile marker 42.66, where the Operating Clerk pulled over and took two photos of the flames, each bearing a timestamp of 7:03 a.m., November 8, 2018. These photographs have been provided by PG&E to CAL FIRE.

Between approximately 6:30 a.m. and 7:00 a.m. on November 8, 2018, a Syblon Reid welding truck operator took two photos of the fire from a location at Highway 70 near Poe Dam. These photographs have been provided by PG&E to CAL FIRE.

At approximately 7:20 a.m. on November 8, 2018, another PG&E Electrical Machinist, who also had heard the Hydro Supervisor's radio call while driving north on Highway 70, observed a fire moving from the vicinity of the Union Pacific Railroad tracks up the west side of Feather River Canyon, south of Pulga.

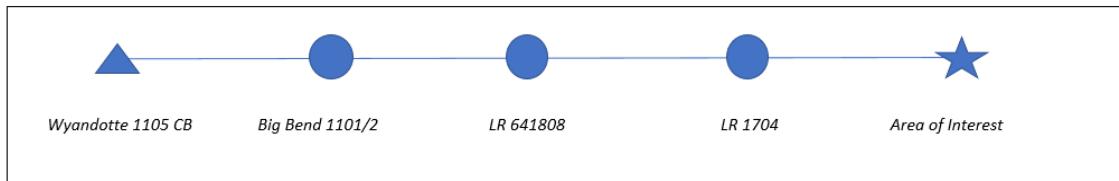
In the afternoon of November 8, 2018, PG&E conducted an aerial patrol of the Caribou-Palermo 115 kV Transmission Line at Tower :27/222. The patrol identified on Tower :27/222 a suspension insulator supporting a transposition jumper that had

separated from an arm on the tower. The suspension insulator and the transposition jumper remained suspended approximately 20-30 feet above the ground. As noted above, on the same day, PG&E filed with the CPUC an EIR (Incident No. 181108-9002) concerning an outage on the line and the results of the aerial patrol of the line that day, including the condition of Tower :27/222.

On November 14, 2018, at CAL FIRE's request, PG&E assisted CAL FIRE's collection of assets from Tower :27/222 and the adjacent Tower :27/221. CPUC staff were on site to observe the collection. At the time of the collection, at Tower :27/222, PG&E observed a broken C-hook that had attached the suspension insulator to a tower arm, along with wear at the connection point. In addition, PG&E observed a flash mark on Tower :27/222 near where the jumper was suspended and damage to the transposition jumper and suspension insulator.

At Tower :27/221, there was an insulator hold down anchor that had become disconnected. The insulator hold down anchor is not an energized piece of equipment. As noted below, this issue had already been identified for repair during an aerial patrol in September 2018.

Camp 2 Incident Location



Single Line Diagram of the Big Bend 1101 12 kV Distribution Circuit

On November 8, 2018, at approximately 6:45 a.m., the PG&E Big Bend 1101 12 kV Distribution Circuit experienced an outage. At that time, LR 1704 (which protects assets downstream of it on the Big Bend 1101 12 kV Distribution Circuit) opened. Four customers on Flea Mountain were affected by the outage (PG&E, AT&T Inc., DigitalPath, Inc. and Yankee Hill Fire Council). At the time of the Camp Fire, auto-reclosing for LR 1704 was disabled as part of PG&E's wildfire mitigation program.

According to certain November 16, 2018 media reports, a review of first responder radio transmissions on the morning of November 8, 2018 indicated a possible second ignition point for the Camp Fire on Rim Road east of Concow Reservoir.

On November 9, 2018, a PG&E Lineman patrolling the Big Bend 1101 12 kV Distribution Circuit arrived at LR 1704. The Lineman had been dispatched to identify a means of isolating the fault detected on the line. The Lineman observed that the LR 1704 pole and other equipment were on the ground.

On November 11, 2018, a PG&E General Construction ("GC") Sub-foreman and Lineman patrolled the Big Bend 1101 12 kV Distribution Circuit from an area a few

spans south of LR 1704 up to Flea Mountain. The Sub-foreman noted bullets and bullet holes at the break point of the LR 1704 pole and bullet dents on the LR 1704 control box. He also noted shotgun pellets embedded in the LR 1704 pole. The Sub-foreman took photos from multiple locations along Concow Road. These photographs have been provided by PG&E to CAL FIRE.

On November 12, 2018, a PG&E Troubleshooter patrolled the Big Bend 1101 12 kV Distribution Circuit from an area several spans south of LR 1704 up to Flea Mountain. The Troubleshooter observed fallen trees, wires down, and poles that were damaged and/or down near the intersection of Concow Road and Rim Road. The Troubleshooter observed that some of the fallen trees lay on top of the downed conductors. The location at which the Troubleshooter observed trees on conductors is approximately two-thirds of a mile north of LR 1704. The Troubleshooter took photos from multiple locations along Concow Road. These photographs have been provided by PG&E to CAL FIRE.

A burnt Dodge truck was observed near the Camp 2 incident location by PG&E employees assisting CAL FIRE with evidence collection.

Patrol and Inspection History:

Camp 1 Incident Location

Tower :27/222

Steel structures on PG&E's 115 kV transmission lines, such as Tower :27/222, are subject to maintenance patrols annually and detailed inspections every five years. During a detailed inspection of a transmission line, PG&E personnel are instructed to look for and document abnormalities or circumstances that will negatively impact safety, reliability, or asset life. Detailed inspections are typically done by ground.

PG&E's understanding based upon its records is that a 2009 detailed inspection of the Caribou-Palermo 115 kV Transmission Line identified for replacement the three-bolt connectors associated with Tower :27/222, as well as those associated with other towers on the line. Three-bolt connectors are pieces of equipment used to join two ends of conductor together in a way that allows electrical current to continue to flow through the conductor segments. Three-bolt connectors are different from the C-hook that appears to have failed at Tower :27/222.

PG&E's understanding based upon its records is that the next detailed inspection for Tower :27/222 was completed in August 2014. PG&E's understanding based upon its records is that no new findings were reported. Likewise, no new findings were reported for Tower :27/222 during PG&E aerial patrols conducted between 2009 and 2018.

PG&E's understanding based upon its records is that, since the last detailed inspection in 2014, PG&E has conducted aerial patrols in July 2015, August 2016, September 2017 and, most recently, September 2018.

PG&E also performs non-routine patrols on the Caribou Palermo 115 kV Transmission Line on an as-needed basis. These patrols may, but do not always, include the entire line. PG&E's understanding based upon its records is that, in the five years preceding the Camp Fire, PG&E performed non-routine aerial patrols on the Caribou-Palermo 115 kV Transmission Line in May 2014, April 2015, May 2015, December 2015, October 2016 and August 2017. PG&E performed the non-routine aerial patrol in May 2014 due to a CAISO maintenance review. PG&E performed the non-routine aerial patrol in April 2015 in response to a notification by the Grid Control Center ("GCC"). PG&E performed the non-routine aerial patrols in May 2015 and December 2015 in response to outages on the line. PG&E performed the non-routine aerial patrol in October 2016 in response to an outage on the line caused by lightning in the area. PG&E performed the non-routine aerial patrol in August 2017 in response to a relay. PG&E's understanding based upon its records is that no issues were reported for Tower :27/222 as a result of the foregoing non-routine patrols.

PG&E also conducts emergency aerial patrols in response to a momentary or sustained outage caused by an unknown condition on an overhead or underground transmission line. As with non-routine aerial patrols, emergency aerial patrols on the Caribou-Palermo 115 kV Transmission Line may, but do not always, include the entire line. PG&E's understanding based upon its records is that, in the five years preceding the Camp Fire, PG&E performed emergency aerial patrols on the Caribou-Palermo 115 kV Transmission Line in November 2013, February 2015, January 2017 and February 2017. PG&E's understanding based upon its records is that no new findings were reported for Tower :27/222 as a result of these patrols.

PG&E's understanding based upon its records is that PG&E also performed infrared ("IR") patrols of the Caribou-Palermo 115 kV Transmission Line in October 2008, May 2010, May 2012, May 2014, June 2015, May 2016, May 2017 and May 2018. IR patrols use thermographic technology to identify abnormal conditions on electrical equipment, and are typically done by air. PG&E's understanding based upon its records is that these patrols did not identify any new issues related to Towers :27/222.

The Caribou-Palermo 115 kV Transmission Line is also subject to Light Detection and Ranging ("LiDAR") surveys to create a three-dimensional model of the transmission facilities and surrounding vegetation. These surveys are generally performed as part of PG&E's vegetation management program. LiDAR surveys are intended to identify trees that are within defined vegetation clearance distances of transmission lines, and identify trees capable of striking the lines and pole or tower structures. PG&E conducts follow-up foot patrols to evaluate trees that are dead, leaning, uprooted, rotten or defected with cracks in the trunks. PG&E's understanding based upon its records is that vegetation management conducted LiDAR surveys of the Caribou-Palermo 115 kV Transmission Line in December 2012, April 2014, April 2015, April 2016, October 2016, October 2017 and, most recently, September 2018. PG&E's understanding based upon its records is that no vegetation management work related to Tower :27/222 was prescribed as a result of the 2017 survey. The analysis of the September 2018 survey data for year 2019 work has not yet been completed.

PG&E's understanding based upon its records is that the three-bolt connector replacement work on Tower :27/222 was completed in 2016 by the transmission division of PG&E's GC group. The three-bolt connectors along the Caribou-Palermo 115 kV Transmission Line were replaced with parallel groove connectors. Three-bolt connectors and parallel groove connectors are different from the C-hook that appears to have failed.

Tower :27/221

PG&E's understanding based upon its records is that during the last detailed inspection of Tower :27/221 in 2014, no new findings were reported. Similarly, no new findings were reported for Tower :27/221 as a result of routine aerial patrols of the Caribou-Palermo 115 kV Transmission Line in July 2015, August 2016 and September 2017. No new findings were reported for Tower :27/221 as a result of non-routine aerial patrols of the Caribou-Palermo 115 kV Transmission Line in May 2014, April 2015, May 2015, December 2015, October 2016 and August 2017. No new findings were reported for Tower :27/221 as a result of the emergency aerial patrols conducted in November 2013, February 2015, January 2017 and February 2017. No new findings were reported for Tower :27/221 as a result of the IR patrols conducted in October 2008, May 2010, May 2012, May 2014, June 2015, May 2016, May 2017 and May 2018. PG&E's understanding based upon its records is that vegetation management conducted a LiDAR survey of the Caribou-Palermo 115 kV Transmission Line in December 2012, April 2014, April 2015, April 2016, October 2016, October 2017 and, most recently, September 2018. PG&E's understanding based upon its records is that no vegetation management work related to Tower :27/221 was prescribed as a result of the 2017 survey. The analysis of the September 2018 survey data for year 2019 work has not yet been completed.

PG&E's understanding based upon its records is that during the most recent routine aerial patrol of the line, in September 2018, a new finding was reported for Tower :27/221 because an insulator hold down anchor's turnbuckle had become disconnected and required repair. This is the same issue that was identified during CAL FIRE's November 14, 2018 collection of evidence. As noted above, an insulator hold down anchor is not an energized piece of equipment. As a result of the September 2018 aerial patrol, a notification was created to repair the insulator hold down anchor within 12 months. That notification was open at the time of the Camp Fire in November 2018.

Camp 2 Incident Location

For distribution lines, PG&E performs patrols and inspections on a plat map-by-plat map basis. The Camp 2 incident location on the Big Bend 1101 12 kV Distribution Circuit falls within the area of Plat Maps R36 and S36.

PG&E's understanding based upon its records is that PG&E inspected the area corresponding to Plat Map R36 in March 2014, March 2015, February 2016 and March 2017. In addition, PG&E's understanding based upon its records is that PG&E

conducted a ground patrol of this area in April 2018. During these inspections and patrols, no findings were reported for the area, except that bird shot damage to a conductor and a damaged conductor on an insulator were reported as a result of the February 2016 inspection, and minor work was performed during that inspection. PG&E's understanding based upon its records is that during the February 2016 inspection, in an area approximately one mile north of the intersection of Concow Road and Rim Road, minor work identified as "Marking—Install/Replace" was performed on one pole, and minor work identified as "High Sign—Install" was performed on two poles. PG&E's understanding based upon its records is that the bird shot damage to a conductor was repaired in April 2016. PG&E's understanding based upon its records is that the damaged conductor on an insulator was also repaired in April 2016.

PG&E's understanding based upon its records is that PG&E inspected the area corresponding to Plat Map S36 in March 2014, March 2015, February 2016 and February 2017. In addition, PG&E's understanding based upon its records is that PG&E conducted a ground patrol of this area in February 2018. No findings were reported as a result of the March 2014, March 2015 and February 2017 inspections. PG&E's understanding based upon its records is that during the February 2016 inspection, minor work identified as "Marking—Install/Replace" was performed on a pole two poles northeast of LR 1704.

PG&E's understanding based upon its records is that PG&E vegetation management contractors performed inspections of the area near the intersection of Concow Road and Rim Road in August 2015, May 2016, June 2017, September 2017, April 2018 and August 2018. No vegetation management work was prescribed as a result of the September 2017, April 2018 and August 2018 inspections. As a result of the August 2015 vegetation management inspection, in October 2015, the top was pruned from a Douglas Fir, a Ponderosa Pine and a Sugar Pine were pruned, and a Cedar was removed. As a result of the May 2016 vegetation management inspection, a White Fir was removed in September 2016 and a Ponderosa Pine was removed in October 2016. As a result of the June 2017 vegetation management inspection, a Tan Oak was pruned in August 2017 and the top was pruned from a Cedar tree in November 2017.

CAL FIRE Evidence Collection:

CAL FIRE initially restricted access to Tower :27/222 and adjacent Tower :27/221 on the Caribou-Palermo 115 kV Transmission Line, but eventually permitted PG&E access for the limited purpose of cooperating with their investigation. On November 14, 2018, as part of their investigation of the Camp Fire, CAL FIRE requested PG&E's assistance collecting assets from Towers :27/222 and :27/221. PG&E assisted CAL FIRE with the requested collection, and CPUC staff were on site to observe. It was during the CAL FIRE collection in November 2018 that PG&E observed a broken C-hook at Tower :27/222 that had attached the suspension insulator to a tower arm, along with wear at the connection point. It was also at this time that PG&E observed a flash mark on Tower :27/222 near where the transposition jumper was suspended, and damage to the transposition jumper and suspension insulator.

During November 2018, PG&E assisted CAL FIRE's collection of the following items from Towers :27/222 and :27/221: (i) five insulator strings consisting of a total of 49 insulator bells, (ii) two hold down anchors, (iii) two hold down arms, (iv) five C-hooks, (v) a jumper assembly and (vi) two jumper support arms.

During November 2018, CAL FIRE also requested assistance from PG&E to collect evidence related to the Camp 2 incident location. CAL FIRE provided PG&E with receipts for evidence collected prior to PG&E's arrival at the site at the intersection of Concow Road and Rim Road.

With respect to the Camp 2 incident location, PG&E assisted CAL FIRE's collection of Recloser Controllers for Line Reclosers 1704 and 641808 from the area near Concow Road and the area near the intersection of Highway 70 and Deadwood Road. At CAL FIRE's request, PG&E provided CAL FIRE Recloser Controller data from Line Reclosers 1704 and 641808. During November 2018, PG&E also assisted CAL FIRE's collection of the following items from the area near the intersection of Concow Road and Rim Road: (i) a power pole top with cross member, (ii) seven conductor rolls, (iii) nine conductor pieces, (iv) three tie wires, (v) an insulator and insulator bolts, (vi) three pieces of hardware, (vii) a crossarm, (viii) a middle pole and middle pole stump, (ix) a crossmember, (x) a south pole top with hardware and (xi) a middle pole butt.

In addition, PG&E has assisted CAL FIRE's collection of one Smart Meter from Camp Creek Road, Pulga, one Smart Meter from 13298 Concow Road, Oroville, four Smart Meters from the PG&E Cell Repeater Station at Dixie Road on Flea Mountain, and nine Smart Meters from the Pulga area. At CAL FIRE's request, PG&E downloaded and provided to CAL FIRE data contained within these Smart Meters.

Timeline:

| <u>Event</u> | <u>CAL FIRE Bates Number Reference</u> |
|--|--|
| <u>October 2008:</u> Infrared patrol of Caribou-Palermo 115 kV Transmission Line. | |
| <u>August 2009:</u> Detailed inspection of Caribou-Palermo 115 kV Transmission Line. | |
| <u>May 2010:</u> Infrared patrol of Caribou-Palermo 115 kV Transmission Line. | |
| <u>August 2010:</u> Aerial patrol of Caribou-Palermo 115 kV Transmission Line. | |
| <u>August 2011:</u> Aerial patrol of Caribou-Palermo 115 kV Transmission Line. | |
| <u>May 2012:</u> Infrared patrol of Caribou-Palermo 115 kV Transmission Line. | |

| <u>Event</u> | <u>CAL FIRE Bates Number Reference</u> |
|---|--|
| <u>August 2012:</u> Aerial patrol of Caribou-Palermo 115 kV Transmission Line. | |
| <u>December 2012:</u> Vegetation Management LiDAR Survey of Caribou-Palermo 115 kV Transmission Line. | |
| <u>August 2013:</u> Aerial patrol of Caribou-Palermo 115 kV Transmission Line. | |
| <u>November 2013:</u> Emergency aerial patrol of Caribou-Palermo 115 kV Transmission Line. | |
| <u>March 2014:</u> Inspection of facilities on the Big Bend 1101 12 kV Distribution Circuit covered by Plat Map R36. | |
| <u>March 2014:</u> Inspection of facilities on the Big Bend 1101 12 kV Distribution Circuit covered by Plat Map S36. | |
| <u>April 2014:</u> Vegetation Management LiDAR Survey of Caribou-Palermo 115 kV Transmission Line. | |
| <u>May 2014:</u> Non-routine aerial patrol on the Caribou-Palermo 115 kV Transmission Line. | |
| <u>May 2014:</u> Infrared patrol of Caribou-Palermo 115 kV Transmission Line. | |
| <u>August 2014:</u> Detailed inspection of Caribou-Palermo 115 kV Transmission Line. | |
| <u>February 2015:</u> Emergency aerial patrol of Caribou-Palermo 115 kV Transmission Line. | |
| <u>March 2015:</u> Inspection of facilities on the Big Bend 1101 12 kV Distribution Circuit covered by Plat Map R36. | PGE-CAMP-CF-000000079-82 |
| <u>March 2015:</u> Inspection of facilities on the Big Bend 1101 12 kV Distribution Circuit covered by Plat Map S36. | PGE-CAMP-CF-000000091-94 |
| <u>April 2015:</u> Vegetation Management LiDAR Survey of Caribou-Palermo 115 kV Transmission Line. | |
| <u>April 2015:</u> Non-routine aerial patrol on the Caribou-Palermo 115 kV Transmission Line. | PGE-CAMP-CF-0000000171 |
| <u>May 2015:</u> Non-routine aerial patrol on Caribou-Palermo 115 kV Transmission Line. | PGE-CAMP-CF-0000000172 |
| <u>June 2015:</u> Infrared patrol of Caribou-Palermo 115 kV Transmission Line. | PGE-CAMP-CF-0000000173 |
| <u>July 2015:</u> Aerial patrol of Caribou-Palermo 115 kV Transmission Line. | PGE-CAMP-CF-000000017-78 |
| <u>August 2015:</u> Vegetation Management inspection of the area near the intersection of Concow Road and Rim Road. | |
| <u>October 2015:</u> The top was pruned from a Douglas Fir, a Ponderosa Pine and a Sugar Pine were pruned, and a Cedar was removed in the area near the intersection of Concow Road and Rim Road. | |

| <u>Event</u> | <u>CAL FIRE Bates Number Reference</u> |
|---|--|
| <u>December 2015:</u> Non-routine aerial patrol on Caribou-Palermo 115 kV Transmission Line. | PGE-CAMP-CF-0000000174-75 |
| <u>February 2016:</u> Inspection of facilities on the Big Bend 1101 12 kV Distribution Circuit covered by Plat Map S36. | PGE-CAMP-CF-0000000095-102 |
| <u>February 2016:</u> Inspection of facilities on the Big Bend 1101 12 kV Distribution Circuit covered by Plat Map R36. | PGE-CAMP-CF-0000000083-90 |
| <u>April 2016:</u> Vegetation Management LiDAR Survey of Caribou-Palermo 115 kV Transmission Line. | |
| <u>April 2016:</u> Damaged conductor and insulator on Big Bend 1101 12 kV Distribution Circuit repaired. | PGE-CAMP-CF-0000000139-165 |
| <u>May 2016:</u> Infrared patrol of Caribou-Palermo 115 kV Transmission Line. | PGE-CAMP-CF-0000000176-178 |
| <u>May 2016:</u> Vegetation Management inspection of the area near the intersection of Concow Road and Rim Road. | |
| <u>June 2016:</u> Three-bolt connectors on Tower :27/222 are replaced. | PGE-CAMP-CF-0000000166-167 |
| <u>August 2016:</u> Aerial patrol of Caribou-Palermo 115 kV Transmission Line. | PGE-CAMP-CF-0000000012-16 |
| <u>September 2016:</u> A White Fir was removed in the area near the intersection of Concow Road and Rim Road. | |
| <u>October 2016:</u> Vegetation Management LiDAR Survey of Caribou-Palermo 115 kV Transmission Line. | |
| <u>October 2016:</u> Non-routine aerial patrol on Caribou-Palermo 115 kV Transmission Line. | PGE-CAMP-CF-0000000179-800 |
| <u>October 2016:</u> A Ponderosa Pine was removed in the area near the intersection of Concow Road and Rim Road. | |
| <u>January 2017:</u> Emergency aerial patrols of Caribou-Palermo 115 kV Transmission Line. | |
| <u>February 2017:</u> Emergency aerial patrol of Caribou-Palermo 115 kV Transmission Line. | |
| <u>February 2017:</u> Inspection of facilities on the Big Bend 1101 12 kV Distribution Circuit covered by Plat Map S36. | PGE-CAMP-CF-0000000116-120 |
| <u>March 2017:</u> Inspection of facilities on the Big Bend 1101 12 kV Distribution Circuit covered by Plat Map R36. | PGE-CAMP-CF-0000000111-115 |
| <u>May 2017:</u> Infrared patrol of Caribou-Palermo 115 kV Transmission Line. | PGE-CAMP-CF-0000000181 |
| <u>June 2017:</u> Vegetation Management inspection of the area near the intersection of Concow Road and Rim Road. | |
| <u>August 2017:</u> Non-routine aerial patrol on Caribou-Palermo 115 kV Transmission Line. | PGE-CAMP-CF-0000000182-186 |
| <u>August 2017:</u> A Tan Oak was pruned in the area near the intersection of Concow Road and Rim Road. | |

| <u>Event</u> | <u>CAL FIRE Bates Number Reference</u> |
|--|--|
| <u>September 2017:</u> Aerial patrol of Caribou-Palermo 115 kV Transmission Line. | PGE-CAMP-CF-000000001-06 |
| <u>September 2017:</u> Vegetation Management inspection of the area near the intersection of Concow Road and Rim Road. | |
| <u>October 2017:</u> Vegetation Management LiDAR Survey of Caribou-Palermo 115 kV Transmission Line. | |
| <u>November 2017:</u> The top was pruned from a Cedar in the area near the intersection of Concow Road and Rim Road. | |
| <u>February 2018:</u> Patrol of facilities on the Big Bend 1101 12 kV Distribution Circuit covered by Plat Map S36. | PGE-CAMP-CF-0000000107-110 |
| <u>April 2018:</u> Patrol of facilities on the Big Bend 1101 12 kV Distribution Circuit covered by Plat Map R36. | PGE-CAMP-CF-0000000103-106 |
| <u>April 2018:</u> Vegetation Management inspection of the area near the intersection of Concow Road and Rim Road. | |
| <u>May 2018:</u> Infrared patrol of Caribou-Palermo 115 kV Transmission Line. | PGE-CAMP-CF-0000000187-188 |
| <u>August 2018:</u> Vegetation Management inspection of the area near the intersection of Concow Road and Rim Road. | |
| <u>September 2018:</u> Vegetation Management LiDAR Survey of Caribou-Palermo 115 kV Transmission Line. | |
| <u>September 2018:</u> Aerial patrol of Caribou-Palermo 115 kV Transmission Line. | PGE-CAMP-CF-0000000007-11 |
| <u>November 8, 2018, 6:15 a.m.:</u> The PG&E Caribou-Palermo 115 kV Transmission Line relayed and de-energized. | |
| <u>November 8, 2018, approx. 6:28 a.m.:</u> PG&E Hydro Supervisor reported seeing fire in a clearing beneath PG&E transmission lines north of Pulga. | |
| <u>November 8, 2018, 6:44 a.m.:</u> PG&E Electrical Machinist photographed the fire from Highway 70. | |
| <u>November 8, 2018, 6:45 a.m.:</u> The PG&E Big Bend 1101 12 kV Distribution Circuit experienced an outage, and LR 1704 opened. | |
| <u>November 8, 2018, between approx. 6:30 and 7:00 a.m.:</u> Syblon Reid employee photographed the fire from Highway 70. | |
| <u>November 8, 2018, between approx. 6:48 and 7:53 a.m.:</u> Two PG&E Hydro employees photographed the fire from Cresta Dam. | |
| <u>November 8, 2018, approx. 7:01 and 7:03 a.m.:</u> PG&E Operating Clerk photographed the fire from two points along Highway 70. | |

| <u>Event</u> | <u>CAL FIRE Bates Number Reference</u> |
|--|--|
| <u>November 8, 2018, approx. 7:20 a.m.:</u> PG&E employee observed fire moving from the vicinity of the Union Pacific Railroad tracks up the west side of Feather River Canyon south of Pulga. | |
| <u>Nov. 8, 2018, between approx. 9:00 a.m. and 1:00 p.m.:</u> A PG&E Troubleman conducted an aerial patrol of the Caribou-Palermo 115 kV Transmission Line. | |
| <u>November 8, 2018, 6:06 p.m.:</u> PG&E filed with the CPUC an Electric Safety Incident Report (Incident No. 181108-9002) concerning the 6:15 a.m. outage on the Caribou-Palermo 115 kV Transmission Line. | |
| <u>November 9, 2018, approx. 2:24 p.m.:</u> PG&E Lineman patrolled a section of the Big Bend 1101 12 kV Distribution Circuit up to the pole with LR 1704 and observed the pole and other equipment on the ground. | |
| <u>November 11, 2018:</u> PG&E Sub-foreman surveyed the Big Bend 1101 12 kV Distribution Circuit from an area a few spans south of LR 1704 up to Flea Mountain, and observed LR 1704 and its pole on the ground. | |
| <u>November 12, 2018, approx. 9:30 a.m.:</u> PG&E Troubleman patrolled Concow Road north of LR 1704 and observed damaged and downed poles and wires, as well as snapped trees, some of which lay on top of the downed wires. | |
| <u>November 14, 2018:</u> PG&E assisted CAL FIRE with collection of evidence at the Camp 1 incident location. | |
| <u>November 14, 15 and 20, 2018:</u> PG&E assisted CAL FIRE with collection of evidence at the Camp 2 incident location. | |
| <u>November 16, 2018:</u> PG&E filed with the CPUC an Electric Safety Incident Report concerning the 6:45 a.m. outage on the Big Bend 1101 12 kV Distribution Circuit. | |
| <u>December 11, 2018:</u> PG&E filed with the CPUC a 20-Day Supplemental Report regarding the Camp Fire. | |

Source List:

| Source | Brief Description |
|---|--|
| Corrective Work Form Electric Transmission Line (November 23, 2013); Corrective Work Form Electric Transmission Line (February 7, 2015); Corrective Work Form Electric Transmission Line (January 9, 2017); Corrective Work Form Electric Transmission Line (January 24, 2017); Corrective Work Form Electric Transmission Line (February 21, 2017) | Emergency Patrol Records of Caribou-Palermo Transmission Line |
| Corrective Work Form Electric Transmission Line (June 18, 2016) | June 2016, Maintenance performed on Tower :27/222 |
| Corrective Work Form Electric Transmission Line (May 5, 2014); PGE-CAMP-CF-0000000171; PGE-CAMP-CF-0000000172; PGE-CAMP-CF-0000000174; PGE-CAMP-CF-0000000179; PGE-CAMP-CF-0000000182 | Non-Routine Aerial Patrol Records on Caribou-Palermo Transmission Line |
| Caribou-Palermo Detailed Inspection 2014 | August 2014, Overhead detailed inspection of Caribou-Palermo Transmission Line |
| Corrective Work Form Electric Transmission Line (November 23, 2013); Corrective Work Form Electric Transmission Line (February 7, 2015); Corrective Work Form Electric Transmission Line (January 9, 2017); Corrective Work Form Electric Transmission Line (January 24, 2017); Corrective Work Form Electric Transmission Line (February 21, 2017) | Emergency Patrol Records of Caribou-Palermo Transmission Line |

| <u>Source</u> | <u>Brief Description</u> |
|---|--|
| Corrective Work Form Electric Transmission Line (June 18, 2016) | June 2016, Maintenance performed on Tower :27/222 |
| Corrective Work Form Electric Transmission Line (May 5, 2014); PGE-CAMP- CF-0000000171; PGE- CAMP-CF-0000000172; PGE-CAMP-CF- 0000000174; PGE-CAMP- CF-0000000179; PGE- CAMP-CF-0000000182 | Non-Routine Aerial Patrol Records on Caribou- Palermo Transmission Line |
| <i>Enterprise-Record, The Mystery Camp Fire 'Second Start': Was It Captured on Firewatch Camera?</i> (Nov. 16, 2018) | Chico Enterprise-Record News Article, https://www.chicoer.com/2018/11/16/was-possible-second-camp-fire-ignition-caught-on-firewatch-camera/ |
| PGE-CAMP-CF- 000000017; PGE-CAMP- CF-0000000012; PGE- CAMP-CF-0000000001; PGE-CAMP-CF-0000000007 | Aerial Patrol Records of Caribou-Palermo Transmission Line |
| PGE-CAMP-CF-0000000166 | Corrective Work Form Electric Transmission Line (September 16, 2009), Maintenance performed on Tower :27/222 |
| R36 Inspection 2014; PGE- CAMP-CF-0000000079; PGE-CAMP-CF- 0000000083; PGE-CAMP- CF-0000000111; PGE- CAMP-CF-0000000103; S36 Inspection 2014; PGE- CAMP-CF-0000000091; PGE-CAMP-CF- 0000000095; PGE-CAMP- CF-0000000116; PGE- CAMP-CF-0000000107 | Electric Maintenance Overhead Inspection and Patrol Records for Plat Maps R36 and S36 |
| PGE-CAMP- CF-0000000139-165 | Electric Overhead Tag 111417029 for damaged conductor, identified February 24, 2016 |
| PGE-CAMP-CF- 0000000139-41 | Electric Overhead Tag for bird shot damage to conductor, identified February 24, 2016 |
| Corrective Work Form Electric Transmission Line (October 17, 2008); Corrective Work Form | Infrared Patrol of Caribou-Palermo Transmission Line |

| <u>Source</u> | <u>Brief Description</u> |
|--|--------------------------|
| Electric Transmission Line (May 4, 2010); Corrective Work Form Electric Transmission Line (May 31, 2012); Corrective Work Form Electric Transmission Line (May 22, 2014); PGE-CAMP-CF-0000000173; PGE-CAMP-CF-0000000176; PGE-CAMP-CF-0000000181; PGE-CAMP-CF-0000000187 | |